

**THE PUBLIC SERVICE COMMISSION
STATE OF SOUTH CAROLINA**

WHEELER M TILLMAN,

Complainant,

-VS-

**SOUTH CAROLINA ELECTRIC &
GAS COMPANY,**

Respondent,

Docket #2011-36-E

COPY

**INTERROGATORIES
(From Complainant to Respondent)**

To Matthew Disenbanner, Attorney for Respondent:

Served upon you now are Interrogatories by Complainant, pursuant to 26 S.C. Code Ann. Regs. Chapter 103-851, Rules of Procedure before the South Carolina Public Service Commission, which are to be answered, unless objected to, and then the objections are to be answered and signed by you respectively as the attorney for the Respondent, or other authorized representative or individual making them.

1. Give the names and addresses of persons known to the Respondent or Respondent's counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

2. Set forth a list of photographs, plats, sketches or other prepared documents in possession of the Respondent or Respondent's counsel that relate to the defenses in the matter.

3. List the names and addresses of any expert witnesses whom the Respondent proposes to use as a witness at the hearing of this matter.

4. For each person known to the Respondent or Respondent's counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the Complainant of the important facts known to or observed by such witnesses, or provide a copy of any written or recorded statements taken from such witnesses.

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**The Public Service Commission
State of South Carolina**

**Wheeler M Tillman, Complainant -vs- South Carolina Electric & Gas Company
Docket #2011-36E**

**INTERROGATORIES
(From Complainant to Respondent)**

Wednesday, February 2, 2011

5. The PSC Tariff Summary Sheet as of 8/5/2010 for SCE&G - Electric, for Tariff Service: **Rate 8 - Residential Service** sets forth **five** different PSC Orders granting certain authority to the Respondent with respect to the delivery of electric service in its territory. For the matter in dispute in this case, identify which PSC Order, or PSC Orders, the Respondent relies upon to **deny the residential rate** to the Complainant for the electric service to the building in dispute.

6. Please extract and set forth the specific language from the PSC Order, or PSC Orders, relied upon in the Respondent's **Answer to Interrogatory #5** above.

7. The PSC Tariff Summary Sheet as of 8/5/2010 for SCE&G - Electric, for Tariff Service: **Rate 9 - General Service** sets forth **five** different PSC Orders granting authority to the Respondent with respect to the delivery of electric service in its territory. For the matter in dispute in this case, identify which PSC Order, or PSC Orders, the Respondent relies upon to **charge a General Service rate** to the Complainant for the electric service to the building in dispute.

8. Please extract and set forth the specific language from the PSC Order, or PSC Orders, relied upon in the Respondent's **Answer to Interrogatory #7** above.

9. Set forth, or otherwise identify, the **Past** Tariff Summary Sheets, or other documents, as of, **or before, 9/21/2000**, upon which SCE&G initially established for Tariff Service: **Rate 8 - Residential Service** to the Complainant with respect to the delivery of electric service for the building in dispute.

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Wednesday, February 2, 2011

10. If the Respondent's Answer to Interrogatory #8, above, makes reference directly or by way of incorporation of any **Past** PSC Order, or **Past** PSC Orders, upon which the Respondent relied **on or before 9/21/2000** for establishing this Residential rate for the building in dispute, identify which **Past** PSC Order, or **Past** PSC Orders.

11. Please extract and set forth the specific language from the **Past** PSC Order, or **Past** PSC Orders, upon in the Respondent's **Answers to Interrogatories #9 and #10**, above, relied upon in the **year 2000**, for establishing the residential rate for the building in dispute.

12. Please provide information, or a rate sheet, for the electric service utilized at the building in dispute from the **first date electric service** was established for the building **(8811 University Boulevard, North Charleston, SC 29406, or 8811 University Boulevard, Suite A, North Charleston, SC)** until the present.

13. Please admit or deny that the Complainant's building in dispute was granted a residential rate by Respondent from **9/2000 until 10/2010**.

14. Complainant alleges the electric service to the building in dispute was established at a **residential rate** from **9/2000 until 10/2010**. For these **ten years** does the Respondent contend the establishment of this rate was a **"mistake"** by the Respondent?

15. Complainant alleges the electric service to the building in dispute was established at a **residential rate** from **9/2000 until 10/2010**. For these **ten years** does the Respondent contend the establishment of this rate was a **"correct rating"** by the Respondent and that Respondent now seeks **a change in he rating** due to recent authority granted it by the Public Service Commission?

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16. For the PSC Orders listed on the Tariff Summary Sheets for **Rate 8 and/or Rate 9 as of 8/5/2010**, identify and extract, from the **Applications** for Rate changes and definitions to delivery sites, language used by the Respondent seeking rate changes to delivery sites which the Respondent wished to apply **"retroactively"**. In other words, did the Respondent inform the Public Service Commission in these **Applications** on rate changes that Respondent would seek to change rates on various delivery sites from residential to General Service? **Please identify and extract such language from its Applications.**

17. Following the issuance of the PSC Orders set forth on the Tariff Summary Sheets for Rate 8 and/Rate 9 as of 8/5/2010, set forth the number of delivery sites which Respondent has changed, or attempted to change, from residential to General Service. In other words, from its general body of rate payers **how many other customers** in its territory are in a similar situation as Complainant wherein such other customers **previously** had residential rates applied to their property sites, but now Respondent seeks and/or did change such rating to General Service.

18. For the number of other customers contained in Respondent's **Answer to Interrogatory #17**, above, which had their ratings changed from residential to General Service, set forth the **amount of either gross or increased revenues** generated by such change from residential to General Service.

19. There are two electric meters on the Complainant's property at 8811 University Boulevard, North Charleston, SC. Are these two meters the same? Or are they different? If different, please describe the differences.

20. When was the first electric meter on the building in dispute **first installed**?

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21. Was the electric meter on the building in dispute **changed out**?
If so, when?

As further required by the Rules which apply before The Public Service Commission, these interrogatories shall be deemed to continue from the time of their service, which is now, until the time of the hearing in this matter so that information sought, which comes to the knowledge of the Respondent or the Respondent's attorney, after original answers to interrogatories have been submitted, shall be promptly transmitted to the Complainant.

By: _____
WHEELER M. TILLMAN
COMPLAINANT

Dated: **Wednesday, February 2, 2011**

Wheeler M Tillman
8811 University Boulevard
North Charleston, SC 29406-9113
Office: (843)569-0212
Cell: (843)442-9435

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**INTERROGATORIES
(From Complainant to Respondent)**

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Wednesday, February 2, 2011

**CERTIFICATE OF MAILING
INTERROGATORIES
(From Complainant to Respondent)**

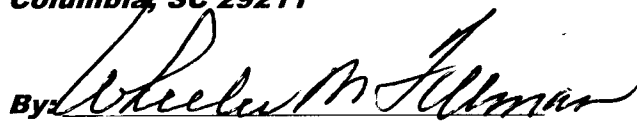
I hereby certify that I have mailed one copy each of the **Interrogatories (From Complainant to Respondent)**, dated **Wednesday, February 2, 2011**, to the attorneys of record for the attorneys and Public Service Commission in this matter at their respective mailing addresses, with first class postage affixed and pre-paid, on **Wednesday** the **2nd** day of **February 2011**, the address of those addressees being as follows:

**1. Matthew Dissenbanner, Esquire
Mail Code C222
220 Operation Way
Cayce, SC 29033**

**2. Jeffrey M Nelson, Esquire
Office of Regulatory Staff
1401 Main Street
Columbia, SC 29201**

**3. Public Service Commission
State of South Carolina
Attn: Clerk's Office
P O Drawer 11649
Columbia, SC 29211**

By:



**WHEELER M TILLMAN
COMPLAINANT**

Wheeler M Tillman
8811 University Boulevard
North Charleston, SC 29406-9839
Office: (843) 569-0212
Cell: (843) 442-9435